Baker & Hostetler LLP

45 Rockefeller Plaza New York, NY 10111 Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona

Attorney for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SERENE WARREN REVOCABLE TRUST U/A/D SEPTEMBER 15, 2005, SERENE WARREN and CHRISTOPHER WARREN, as trustees of the Serene Warren Revocable Trust, and SERENE WARREN, individually,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04514 (SMB)

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: May 16, 2014
- 2. Fact Discovery shall be completed by: December 12, 2014
- 3. The Deadline for Service of Substantive Interrogatories shall be: September 12, 2014
- 4. The Disclosure of Case-in-Chief Experts shall be due: August 14, 2015
- 5. The Disclosure of Rebuttal Experts shall be due: September 14, 2015
- 6. The Deadline for Completion of Expert Discovery shall be: October 13, 2015
- 7. The Deadline for Service of a Notice of Mediation Referral shall be: On or before December 14, 2015
- 8. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before December 28, 2015, or within 14 days after the service of the Notice of Mediation Referral, whichever is earlier.
- 9. The Deadline for Conclusion of Mediation shall be: On or before April 26, 2016, or within 120 days of the date of service of the Notice of Mediator Selection, whichever is earlier.

Dated: March 20, 2014

BAKER & HOSTETLER LLP

By: /s Nicholas J. Cremona_

45 Rockefeller Plaza

New York, New York 10111

Telephone: 212.589.4200 Facsimile: 212.589.4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Marc E. Hirschfield

Email: mhirschfield@bakerlaw.com

Nicholas Cremona

Email: ncremona@bakerlaw.com

Christa C. Turner

Email: cturner@bakerlaw.com

Attorneys for Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC

LOEB & LOEB, LLP

By: /s/ _Daniel B. Besikof_

345 Park Avenue

New York, New York 10154 Telephone: 212.407.4129 Facsimile: 646.417.6335

P. Gregory Schwed

Email: gschwed@loeb.com

Daniel B. Besikof

Email: dbesikof@loeb.com

Attorneys for Defendants